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December 16, 2016

Via ECF

Honorable Robert B. Kugler, U.S.D.J.
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets
Courtroom 4D
Camden, New Jersey 08101

Re: Sabinsa Corporation v. Herbakraft, Inc. and Prakruti Products, Ltd.
Civil Action No.: 14-4738 (RBK)(KMW)

Dear Judge Kugler:

We write on behalf of Defendant Prakruti Products Pvt. Ltd. ("Prakruti") seeking permission per Local Civil Rule 7.1(d)(6) for leave to file the attached proposed sur-reply regarding Plaintiff Sabinsa Corp.'s motion to reopen in light of the new arguments presented in Sabinsa's reply memorandum, filed on December 12, 2016. Specifically, Sabinsa initially argued that infringement of the '415 Patent was irrelevant, addressing infringement for the first time in its reply memorandum. Sabinsa's argument that Prakruti infringes Claim 17 of the '415 patent relies on a mischaracterization of both Prakruti's opposition brief and the evidence provided by Prakruti. Because the Court has not yet indicated whether it will hold oral argument on this motion, without a sur-reply Prakruti will have no opportunity to respond to these new facts and arguments.

We thank the Court for its consideration of Prakruti's request and would be pleased to provide any additional information relevant to the Court's consideration of this matter.

Respectfully submitted,

/s/Christina Saveriano
CHRISTINA SAVERIANO

Enclosure

Cc: Counsel of Record via ECF and email